Enphase Energy has a number of concerns related to the implementation of Reactive Power Priority. This policy proposal indicates that up-sizing inverters will be a solution so that real power is not lost. We disagree with the practicality and the feasibility of up-sizing inverters, particularly in residential applications.

This policy will result in smaller systems being interconnected, particularly in residential applications. The maximum system size is often based upon the continuous output rating of the inverter. In a home with a 200A service panel, the allowable interconnection ampacity, based upon 705.12(D)(2) would generally be 40A of interconnected breakers and 32A of continuous inverter output current. If the inverter is oversized by an additional 15%, then the maximum system size in DC will be reduced by 15%.

This policy also requires that slightly larger inverters are available. While that may be feasible for string inverter and central inverter systems, the existing microinverter products and AC Module products on the market are sized to maximize output of the existing DC modules' nameplate ratings on the market today. New products would need to be developed to meet these requirements. We would ask for 12 months to manufacture larger wattage microinverters to meet this requirement.

Additionally, this policy does not set in place any method of providing compensation to PV system owners for lost power.

For many systems, there is often 1% to 2% voltage rise between the Point of Common Coupling (PCC) and the inverter output terminals. Requiring that the inverters provide VARs at 3% of the nominal voltage means that the inverters will often be sacrificing real power to VARs.

Thank you for your consideration.